

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

KELLY CAHILL, et al.,	)	
individually and on behalf of	)	
of others similarly situated,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	No. 3:18cv-01477-JR
	)	
NIKE, INC., an Oregon	)	
corporation,	)	
	)	
Defendant.	)	

VIDEOCONFERENCE DEPOSITION  
OF  
SHANE WALKER  
VOLUME I

DATE TAKEN: December 17, 2020  
TIME: 9:30 a.m.  
PLACE: Virtual

1 A. Yes.

2 Q. -- Exhibit 505?

3 A. Yes. And we have gone through a transition to  
4 talking about those in different terms over the past  
5 several years.

6 Q. And what do you mean you've gone through  
7 talking about it in different terms?

8 A. So I'm referring to slide 26 in Exhibit 500, we  
9 talk about it in terms of scope and impact, communication  
10 and influence and knowledge and experience, whereas on  
11 the leveling guides, there were more granular views of  
12 what each, I guess, bucket of criteria would be. So  
13 essentially what we've been trying to do is simplify the  
14 way we talk about that criteria.

15 Q. Thank you for the clarification. Let me just  
16 be sure that I understand it.

17 You indicated that the three leveling criteria  
18 were the same as the more granular descriptions that were  
19 on Exhibit 505 presented in a more simplified form; is  
20 that accurate?

21 MS. DAVIS: Misstates the testimony that  
22 they're the same.

23 Go ahead.

24 THE WITNESS: Yes, I was just going to say they  
25 are not exactly the same, but they serve the same

1 purpose.

2 So we are -- we are using the new three buckets  
3 to describe our leveling criteria, and in the past, there  
4 was a more granular view of the leveling criteria.

5 BY MR. BARRY GOLDSTEIN:

6 Q. Okay. When did you start using the three  
7 leveling criteria as opposed to the more granular  
8 description?

9 A. In 2019 when we launched the annual pay review.

10 Q. Byron just asked me a good question. When you  
11 say you launched the APR, annual pay review in 2019,  
12 sometimes there's a confusion between fiscal year '19 and  
13 calendar 2019.

14 A. The calendar year '19, so we launched APR in  
15 June of 2019.

16 Q. So that would be fiscal year '20?

17 A. Yes.

18 Q. Just to make the record clear, Nike's fiscal  
19 year runs from June 1st to May 31st.

20 A. Yes.

21 Q. If you could turn back to Exhibit 505 -- no,  
22 excuse me -- 507 and at slide 10.

23 A. Okay.

24 Q. There is a note, the Nike system of pipeline  
25 family, subfamilies, are very much like Dewey Decimal

1 CERTIFICATE

2

3 STATE OF OREGON )

4 ) ss

5 COUNTY OF MULTNOMAH )

6

7

8

9 I, Teresa L. Rider, CRR, RPR, CCR, CSR, hereby

10 certify that said witness appeared before me via Zoom at

11 the time and place set forth in the caption hereof; that

12 at said time and place I reported in stenotype all

13 testimony adduced and other oral proceedings had in the

14 forgoing matter; that thereafter my notes were

15 transcribed through computer-aided transcription, under

16 my direction; and that the foregoing pages constitute a

17 full, true and accurate record of all such testimony

18 adduced and oral proceedings had, and the whole thereof.

19 I further certify review of the transcript was

20 not requested

21 Witness my hand at Portland, Oregon, this 27th

22 day of December 2020.

23

24

25



*Teresa L. Rider*

Teresa L. Rider  
Oregon CSR No. 12-0421  
Washington CCR No. 2119  
Expires 12-03-23